

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ADELA BAI, on behalf of itself and all others) No. 1:16-cv-00102
similarly situated)
Plaintiffs,) CLASS ACTION
vs.)
TCP INTERNATIONAL HOLDINGS LTD.,)
KAREL ROBERT DEN DAAS, ELLIS YAN,)
and BRIAN CATLETT,)
Defendants.)

)

Pursuant to Local Rule 85.3(h) and the attached affidavit, Daniel R. Warren, attorney for defendants TCP International Holdings Ltd., Karel Robert den Daas, and Brian Catlett, moves this Court to admit Marcella L. Lape *pro hac vice* to appear and participate as counsel in this case for defendants TCP International Holdings Ltd., Karel Robert den Daas, and Brian Catlett.

Ms. Lape is a member in good standing of the highest court of the State of Illinois, effective July 6, 2006. Ms. Lape is also a member of good standing of the bar of the State of Ohio. Ms. Lape became a member of the Ohio bar on November 4, 2004. After moving to Illinois, Ms. Lape determined to go inactive on May 1, 2008. Ms. Lape changed her status to active on April 27, 2015. Ms. Lape is also a member in good standing of the bars of the United States Courts of Appeals for the Sixth, Seventh, and Eleventh Circuits, and the United States District Courts for the Northern District of Illinois, the Eastern District of Wisconsin, and the Southern District of Ohio. Ms. Lape has never been disbarred or suspended from the practice of law or received any reprimand from any court pertaining to conduct or fitness as a member of the bar. Attached as Exhibit A is a sworn affidavit attesting to Ms. Lape's good standing.

The required admission fee of \$120 is being paid via credit card. Ms. Lape will register for electronic filing with this Court upon the granting of this Motion.

Ms. Lape's relevant identifying information is as follows:

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Dated: January 22, 2016

Respectfully submitted,

/s/ Daniel R. Warren
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*Counsel for Defendants TCP
International Ltd., Karel Robert den
Daas, and Brian Catlett*

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of January, 2016, a copy of the foregoing filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Daniel R. Warren
Attorney for Defendants TCP
International Holdings Ltd.,
Karel Robert den Daas, and
Brian Catlett